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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TAD PARK, Individually and on behalf
all others similarly situated,

Plaintiff,

v.

SONDER HOLDINGS INC., FRANCIS
DAVIDSON, SANJAY BANKER,
CHRIS BERRY, and DOMINIQUE
BOURGAULT,

Defendants.

Case No. 2:24-cv-02952-SB (JCx)
[c/w: 2:24-cv-04798-MWF (JCx)]

**NOTICE OF RELATED CASES
[CIVIL L.R. 83-1.3.1]**

Pursuant to Local Rule 83-1.3.1, Defendants Sonder Holdings, Inc. (“Sonder”), Francis Davidson, Chris Berry, Sanjay Banker, and Dominique Bourgault (together, “Defendants”) hereby give notice that this action (the “*Park Action*”), which was transferred to Your Honor on June 4, 2025, was previously consolidated with another putative securities class action, *Duffaydar v. Sonder Holdings Inc., et al.*, Case No. 2:24-cv-02952-SB (JCx) (C.D. Cal.) (the “*Duffaydar Action*”), on October 9, 2024 (together with this action, the “Securities Class Action”). See Dkt. 40. Following consolidation on October 9, 2024, all filings in the Securities Class Action have been on the docket for the *Duffaydar Action*. The *Duffaydar Action* was transferred to The Honorable Stanley Blumenfeld Jr. on June 4, 2025. Defendants believe judicial economy would be served if this case were heard before Judge Blumenfeld Jr.

Additionally, the *Duffaydar Action* has previously been determined to be related to *Versen v. Davidson, et al.*, Case No. 2:25-cv-00761-MEMF (JCx) (the “*Versen Action*”), which was filed on January 28, 2025; *Akcayli v. Davidson, et al.*, Case No. 2:25-cv-02060-AB (JCx) (the “*Akcayli Action*”), which was filed on March 7, 2025; and *Hunter v. Aggarwal, et al.*, Case No. 2:25-cv-02352-ODW (JCx) (the “*Hunter Action*”), which was filed on March 17, 2025 (collectively, the “Derivative Actions”).

Prior to June 4, 2025, the Securities Class Action and Derivative Actions were all pending before The Honorable Otis D. Wright, II. On June 4, 2025, Judge Wright first recused himself from the *Duffaydar Action*, which has been re-assigned to the Honorable Stanley Blumenfeld Jr.. Next, Judge Wright recused himself from the

1 this action, the *Versen* Action, and the *Akçayli* Action, and each of these cases was
2 reassigned to a different judge.¹

3 Under this Court’s Local Rules, cases are related: “(a) [if they] arise from the
4 same or closely related transaction, happening, or event; (b) [if they] call for
5 determination of the same or substantially related or similar questions of law and
6 fact; or (c) for other reasons that would entail substantial duplication of labor if heard
7 by different judges.” L.R. 83-1.3.1. The Securities Class Action and the Derivative
8 Actions satisfy each of these criteria, as previously determined. *See Duffaydar*
9 *Action* Dkt. 40; *Versen* Action, Dkt. 21; *Akçayli* Action, Dkt. 10; *Hunter* Action,
10 Dkt. 14.

11 The Derivative Actions are all shareholder derivative actions purportedly
12 brought on behalf of Sonder. The Securities Class Action and Derivative Actions
13 are based on the same underlying events – the same alleged misstatements in
14 Sonder’s SEC filings in fiscal years 2022 and 2023 relating to its accounting of lease
15 provisions – and assert nearly identical causes of action. All of the Defendants in
16 the Securities Class Action are also named in the Derivative Actions.

17 Accordingly, Defendants submit that the Securities Class Action and the
18 Derivative Actions continue to be related for the purposes of Local Rule 83-1.3.1,
19 and judicial economy would be served if each case was heard before Judge
20 Blumenfeld Jr.

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26 ¹ The *Park* Action was reassigned to Your Honor. The *Versen* Action was reassigned to The
27 Honorable Maame Ewusi-Mensah Frimpong. The *Akçayli* Action was reassigned to The
Honorable Andre Birotte Jr.

1 DATED: June 5, 2025

2 **WILMER CUTLER PICKERING**
3 **HALE AND DORR LLP**

4 By: /s/ Jessica Lewis

5 Jessica Lewis

6 *Attorneys for Defendants Sonder*
7 *Holdings Inc., Francis Davidson,*
8 *Sanjay Banker, Chris Berry, and*
9 *Dominique Bourgault*